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c=US
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BEIJING BRUSSELS LONDON NEW YORK
SAN DIEGO SAN FRANCISCO SEOUL
SHANGHAI SILICON VALLEY WASHINGTON

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 6000

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January 9, 2015

Mary Beth deBeau
Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Mary Beth deBeau
999 E Street NW
Washington, DC 20436

Re: Response of Kent Lindsay and Eric Grimm (Pre-MUR 567)

Dear Ms. deBeau:

This firm has been retained to represent Kent Lindsay and Eric Grimm, two former employees of Mepco Holdings, LLC ("Mepco"). Mr. Lindsay and Mr. Grimm both received letters from the Commission's Assistant General Counsel, Jeff S. Jordan, dated October 6, 2014 concerning the above-referenced matter. On November 24, 2014, the Office of General Counsel agreed to extend the date for a response to those letters to January 9, 2015.

In response to the Commission's letters, we make the following submission on behalf of Mr. Lindsay and Mr. Grimm. Between approximately 2009 and 2012, Mr. Lindsay was employed as Mepco's CFO, reporting directly to Mepco's then-CEO James Laurita, Jr. Between approximately 2005 and 2013, Mr. Grimm was employed as a mine supervisor and later as a Mepco vice president, also reporting directly to Mr. Laurita. Based on the information we have reviewed to date, it appears that, beginning in 2010, Mr. Laurita, either directly or through intermediaries, asked Mr. Lindsay and Mr. Grimm (and, at least in some cases, the spouses of Mr. Lindsay and Mr. Grimm) to make political contributions in suggested amounts to specific candidates and assured them that they would receive direct payroll deposits that would cover the amount of the suggested contribution(s). Based on our preliminary review, it appears that, pursuant to these instructions, Mr. Lindsay and Mr. Grimm made political contributions and accepted payroll deposits which were intended to reimburse them for, or pay them in advance for, at least some of these contributions.

Mr. Lindsay and Mr. Grimm are both prepared to cooperate fully with the Commission to resolve this matter quickly and fairly. Both Mr. Lindsay and Mr. Grimm are also prepared to provide a more detailed response to the above-referenced letters following resolution of the ongoing Department of Justice investigation regarding Mepco's alleged payments or

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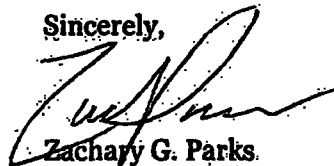
Mary Beth deBeau

December 30, 2014

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reimbursements of political contributions. Moreover, both confirm that, since leaving Mepco, they have not accepted any advance payments or reimbursements from any source for any political contributions and will not do so in the future. They respectfully request that the Office of General Counsel consider this submission and the more detailed submission they are prepared to provide following resolution of the Department of Justice investigation, prior to making any recommended finding to the Commission.

Sincerely,



Zachary G. Parks

COVINGTON & BURLING LLP

*Counsel to Kent Lindsay and
Eric Grimm*

cc: Mr. Mark Shonkwiler
Ms. Jin Lee

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